Gerry P. Fagan Christopher T. Sweeney Jordan W. FitzGerald MOULTON BELLINGHAM PC 27 North 27th Street, Suite 1900 P.O. Box 2559 Billings, Montana 59103-2559

Telephone: (406) 248-7731

Fax: (406) 248-7889

Gerry.Fagan@moultonbellingham.com

<u>Christopher.Sweeney@moultonbellingham.com</u> Jordan.FitzGerald@moultonbellingham.com

> Attorneys for Defendant Watch Tower Bible and Tract Society of Pennsylvania

## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MONTANA **BILLINGS DIVISION**

**JAMIE ROWLAND** ARIANE and SCHULZE,

Plaintiffs.

-VS-

WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., and WATCH TOWER BIBLE AND TRACT SOCIETY OF PENNSYLVANIA,

**DEFENDANT WATCH** 

Case No. CV-20-00059-SPW-TJC

TOWER BIBLE AND TRACT **SOCIETY OF** PENNSYLVANIA'S **UNOPPOSED** MOTION TO RESET **HEARING ON PLAINTIFFS'** MOTION FOR SANCTIONS

Defendants.

Defendant Watch Tower Bible and Tract Society of Pennsylvania ("WTPA") respectfully requests that the hearing set for 9:00 a.m. on Friday, March 25, 2022, on Plaintiffs' Motion for Sanctions be vacated and reset. Unfortunately, WTPA's counsel, Gerry Fagan, tested positive for covid as of today's date and must quarantine. Co-counsel Christopher Sweeney is unavailable because he is on a preset vacation out of the country with his family. Counsel apologizes for the inconvenience to the Court and to the parties.

Counsel is authorized to state that neither Plaintiffs nor WTNY object to this motion. A proposed order is attached hereto.

**DATED** this 21st day of March, 2022.

## MOULTON BELLINGHAM PC

By <u>/s/ Gerry P. Fagan</u>
GERRY P. FAGAN
CHRISTOPHER T. SWEENEY
JORDAN W. FITZGERALD
P.O. Box 2559
Billings, Montana 59103-2559

Attorneys for Watch Tower Bible and Tract Society of Pennsylvania

## **CERTIFICATE OF SERVICE**

I hereby certify that this 21<sup>st</sup> day of March, 2022, a copy of the foregoing was served on the following persons:

- 1. U.S. District Court, Billings Division
- 2. Robert L. Stepans
  Ryan R. Shaffer
  James C. Murnion
  MEYER, SHAFFER & STEPANS, PLLP
  430 Ryman Street
  Missoula, MT 59802
  Attorneys for Plaintiffs
- 3. Guy W. Rogers Joel M. Taylor, Esq. (pro hac vice)

Jon A. Wilson MILLER MCNAMARA & TAYLOR LLP

Brett C. Jensen 100 South Bedford Road, Suite 340

BROWN LAW FIRM, P.C. Mount Kisco, NY 10549

315 North 24<sup>th</sup> Street

P.O. Drawer 849

Billings, MT 59103-0849

Attorneys for Defendant Watchtower Bible and Tract Society of New York, Inc.

By the following means:

1, 2, 3	_CM/ECF		Fax
	_Hand Delivery		E-Mail
	_U.S. Mail		Overnight Delivery Services
		By _	/s/ Gerry P. Fagan

GERRY P. FAGAN